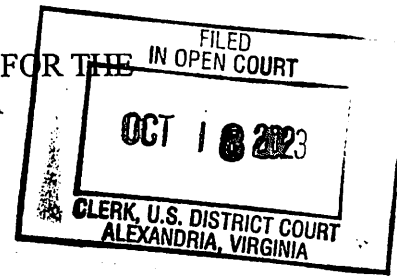


IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

ALEXANDRIA DIVISION



UNITED STATES OF AMERICA

v.

Case No. 1:23-CR-156

DANIEL MARC LOFARO,

Defendant.

**JOINT MOTION FOR ENTRY OF A PROTECTIVE ORDER**

The United States of America, by and through its undersigned counsel, and the defendant, by and through his counsel, respectfully request that the Court enter the attached proposed protective order pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure. In support thereof, the government states as follows:

1. On October 5, 2023, a federal grand jury in the Eastern District of Virginia returned a three-count Indictment charging the defendant, Daniel Marc Lofaro, with one count of distribution of child pornography, in violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1), one count of receipt of child pornography, in violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1), and one count of possession of child pornography, in violation of 18 U.S.C. §§ 2252(a)(4)(B) and (b)(2).

2. During the course of the investigation, the United States has gathered or generated materials that contain sensitive and personal identifying information of the defendant, witnesses, and other individuals in this case (collectively, hereinafter "Protected Information"). Such materials include but are not limited to: data extractions from electronic devices, including images and videos of minors; law enforcement investigative reports; business records, such as those provided by internet service providers; and materials obtained pursuant to grand jury subpoena.

The United States intends to produce the Protected Information, in accordance with the Federal Rules of Criminal Procedure, relevant case law, and any discovery order that is entered in this matter. Given the nature and/or format of the Protected Information, normal redaction is insufficient and impracticable.

3. Rule 16(d)(1) of the Federal Rules of Criminal Procedure provides that the Court may, for good cause, deny, restrict, or defer discovery or inspection, or grant other appropriate relief. Accordingly, the proposed Protective Order regulates discovery in this case by restricting the use and dissemination of the Protected Information in order to safeguard sensitive and personal identifying information.

4. The defendant and his counsel have reviewed this Motion and the proposed Protective Order and have agreed to its terms.

(Continued on next page.)

